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September 14, 2020

VIA ECF

Hon. Leslie G. Foschio  
U.S. District Court, Western District of New York  
2 Niagara Square  
Buffalo, NY 14202

Re: Franklin v. Bison Recovery Group, Inc.  
Case No.: 1:18-cv-00161

Dear Judge Foschio:

We are counsel for Defendant Everest Receivables Services, Inc. in the above matter.

In follow-up to the Court's Order (Doc. 36), please be advised that Defendant requests until October 16, 2020 to depose Plaintiff via video conference. Defendant requests an additional 30 days - until November 16, 2020 - to evaluate and file a dispositive motion of its own.

The Clerk has requested that this letter be filed as a motion.

Thank you for your courtesy and cooperation in this matter.

Very truly yours,

LIPPES MATHIAS WEXLER FRIEDMAN LLP

*/s/ Brendan H. Little*

Brendan H. Little

BHL/bmo

cc: Ricky R. Franklin